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August 1, 2025

VIA ECF

Hon. Lewis J. Liman
United States District Court
Southern District of New York
500 Pearl Street, Room 1620
New York, NY 10007

**Re: Lively v. Wayfarer Studios LLC et al., No. 1:24-cv-10049-LJL;
Liner Freedman Taitelman + Cooley, LLP v. Lively, No. 1:25-mc-00289-LJL**

Dear Judge Liman:

On behalf of Wayfarer Studios LLC, Justin Baldoni, Jamey Heath, Steve Sarowitz, It Ends With Us Movie LLC, Melissa Nathan, The Agency Group PR LLC, and Jennifer Abel (collectively, the “Wayfarer Parties”), as well as Liner Freedman Taitelman + Cooley, LLP (“Liner Freedman”), we write pursuant to Rule 4.b of Attachment A to Your Honor’s Individual Rules to respectfully request that the Court preliminarily seal Exhibit A to our letter filed contemporaneously herewith.

Exhibit A is the transcript from Blake Lively’s deposition, which was conducted on July 31, 2025. The transcript has been designated as confidential by Ms. Lively.

In accordance with Rule 4.b of Attachment A, we respectfully request that the Court not rule on this letter-motion to seal for one week, so that the parties can meet and confer, and Ms. Lively may file a motion for continued sealing if she so chooses.

Respectfully submitted,

/s/ Kevin Fritz

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cc: all counsel of record (via ECF)